

Attachment 2 - EEOC Complaint Form

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION

FILED

APR 1 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY

Ahmed Alrueni

(Name of plaintiff or plaintiffs)

Civil Action Number:

1:21 CV 0296 RP

v.

Accenture Flex LLC
Google LLC

(Supplied
by Clerk's Office)

(Name of defendant or defendants)

COMPLAINT

1. This action is brought by Ahmed Alrueni, Plaintiff,
pursuant to the following selected jurisdiction:

(Please select the applicable jurisdiction)

- ☒ Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment
Discrimination on the basis of race, color, sex (gender, pregnancy and sexual harassment),
religion or national origin.
- ☐ The Age Discrimination in Employment Act (29 USC §§ 621 et seq.) (ADEA).
- ☒ The Americans With Disabilities Act (42 USC §§ 12102 et seq.) (ADA).
- ☐ The Equal Pay Act (29 USC § 206(d)) (EPA).
- ☐ The Rehabilitation Act of 1973 (29 USC § 791 et seq.) (Applicable to federal employees
only).

2. Defendant Accenture Flex, Google (Defendant's name) lives
at, or its business is located at 7700 W Parmer Ln Building B
(street address), Austin (city), TX
(state), 78729 (zip).

- 3a. Plaintiff sought employment from the defendant or was employed by the defendant at 7700 W Parmer Ln. Building B (street address), Austin (city), Texas (state), 78729 (zip).
- 3b. At all relevant times of claim of discrimination, Defendant employed 500+ (#) employees. If defendant is a union, at all relevant times of claim of discrimination, Defendant had _____ (#) members.
4. Defendant discriminated against plaintiff in the manner indicated in paragraph 8 of this complaint on or about March (month) 24th (day) 2020 (year). If incidents of discrimination occurred more than one day, please indicate the beginning and ending dates of such acts: April 2018, August 2019, November 2019 and March 24th 2020.
5. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission (E.E.O.C.) charging defendant with the acts of discrimination indicated in paragraph 7 of this complaint on or about March (month) 31st (day) 2020 (year). (Not applicable to federal civil service employees).
- 6a. The E.E.O.C. issued a **Notice of Right to Sue** which was received by plaintiff on February (month) 25th (day) 2021 (year). (Not applicable to ADEA and EPA claims or federal civil service employees).

VERY IMPORTANT NOTE:

PLEASE ATTACH A COPY OF YOUR NOTICE OF RIGHT TO SUE AND THE ENVELOPE IN WHICH IT WAS RECEIVED TO THIS COMPLAINT.

- 6b. Please indicate below if the E.E.O.C issued a **Determination** in your case:

☐ Yes

☒ No

VERY IMPORTANT NOTE:

IF YOU CHECKED "YES", PLEASE ATTACH A COPY OF THE E.E.O.C.'S DETERMINATION TO THIS COMPLAINT

7. Because of plaintiff's:

(Please select the applicable allegation(s))

☐ Race (If applicable, state race) _____

☐ Color (If applicable, state color) _____

- ☐ Sex (gender, pregnancy or sexual harassment) (If applicable, state sex and claim)
☐ Religion (If applicable, state religion) _____
☒ National Origin (If applicable, state national origin) Egyptian lived and raised in Oman.
☐ Age (If applicable, state date of birth) _____
☒ Disability (If applicable, state disability) didn't let me use keyboard wrist pad.
☐ Prior complaint of discrimination or opposition to acts of discrimination. (Retaliation) (If applicable, explain events of retaliation) _____

The defendant: **(please select all that apply)**

- ☐ failed to employ plaintiff.
☐ terminated plaintiff's employment.
☐ failed to promote plaintiff.
☒ harassed plaintiff.
☒ other (specify) retaliated against me after complaining about harassment two times.

8a. State **specifically** the circumstances under which defendant, its agent, or employees discriminated against plaintiff **PERSONALLY**:

VERY IMPORTANT NOTE: INCLUDE **SPECIFIC DATES, SPECIFIC EVENTS,** AND ANY **SPECIFIC COMMENTS MADE BY DEFENDANT PERTAINING TO THE DISCRIMINATION CLAIM ALLEGED ABOVE.**

Please go to next page.

8b. List any **witnesses** who would testify for plaintiff to support plaintiff's allegations and the substance of their testimony:

Feras Zahra, Mohamed Ali, Mohamed Salih, Rola Estifan Sarmad Ali, Hakima Lotfi, Mohamed Abdulkareem, Hend Mekha, Hussien Alogaili, Ali Jasim.

8c. List any **documentation** that would support plaintiff's allegations and explain what the documents will prove:

Please go to next page.

9. The above acts or omissions set forth in paragraphs 7 and 8 are:

☐ still being committed by defendant.

☒ no longer being committed by defendant.

10. Plaintiff should attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission. This charge is submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

☐ Defendant be directed to employ plaintiff.

☒ Defendant be directed to re-employ plaintiff.

☐ Defendant be directed to promote plaintiff.

☒ Defendant be directed to Re clean my name & Pay for mental, Social and Financial harm and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

3.28.2021
Date

Ahmed
Signature of Plaintiff

6415 Melrose Trail, Apt # B
Address of Plaintiff

Austin Texas 78727
City State Zip Code

Telephone Number(s)

Paragraph 8a:

April 2018:

During the training, two other employees, as well as myself, were asked by Mohaimen Salman if we wanted to join the VE team. This would mean a two dollar increase in pay. Mr. Salman mentioned that the process of choosing the employees was based on their education level. I have a bachelor's degree, while the other two people had high school degrees. They were Iraqi and I am Egyptian.

They chose them to join the VE team and didn't explain why they didn't choose me. My attendance and background was the best, as far as I was concerned. At that point, I was going to give them the badge and just quit the job, but Mohaimen convinced me to wait because they wanted me on another team.

August 2019:

Ahmed Tamam, a team lead, didn't let me use a keyboard wrist pad because he said I needed a doctor's notice. I showed him a note that explained that I went to the doctor due to the pain in my wrists, but he said it wasn't good enough. Other employees were allowed to use the keyboard wrist pads without a doctor's notice.

November 2019:

Karim Ahmed, a team lead, denied doing an interview with me for an open position because he said I missed the time. I was confused about how he wrote the time and I contacted him before the interview was supposed to finish. I was led to believe that he acted this way because of his dislike for me based on my national origin. Later all of the other candidates who applied for the position found out that Karim Ahmed had already chosen someone for the position before he interviewed any of the candidates.

March 2020:

I was terminated after I complained about another employee who was harassing me. I stopped talking to Mohamed Abdelaziz because of his anger issues, hateful statements towards people from Iraq, threats to physically harm other people, and his threat to shoot the people that work with us.

Paragraph 8c:

- 1- Item 1: Screenshot of a message that was sent to me and Feras Zahra from Mohamed Abdelaziz talking about how he hates Iraqis. He was also calling them spies, based on their prior work with the US military.
- 2- Item 2: Austin Police Department (ADP) report showing that the ADP was contacted by Google security, not me, or the FBI like how Accenture Flex's position statement to the EEOC (Item 4).

- 3- Item 3: An email that was sent to me on March 9th, 2020 from Accenture HR saying I'm "not being disciplined", after the decision was already made to fire me on March 5th, 2020 based on Accenture Flex's position statement to the EEOC (Item 5). It shows that Accenture told Google that I fabricated the threat, because it was better than telling them they ended the complaint in a friendly way to keep both employees.
- 4- Item 4: Shows that Google and Accenture fabricated a reason for firing me. I only reported Mohamed Abdelaziz's behavior to Accenture HR on February 18th, 2020 and they decided to end the complaint in a friendly way after giving him a warning on February 26th, 2020; they let him back on February 27th, 2020. I never reported the complaint to the FBI or police. As you will see in my other documents, Google was the one who called the police.
- 5- Item 5: Shows that Google decided to let me go the same day they became aware of the threat. This is proof that Accenture didn't conduct a real investigation into my allegations, because they didn't ask Google for the camera footage from when Abdelaziz harassed me for the second time on February 18th, 2020. They only asked for the camera footage after Google told Accenture on March 5th that they didn't want me back; this creates a lot of confusion about how Accenture conducted their investigation.
- 6- Item 6: My call log for February 18th, 2020 and March 5th, 2020. It shows that I'm not the one who contacted the FBI, and I wish the court would request this information from the FBI.
- 7- Item 7: This is a report showing my doctor visit because of the pain I had in my wrist. I took a copy of it to Ahmed Tamam, but he still didn't let me use the keyboard wrist pad, while other employees were allowed to have it without a doctor's notice. Feras Zahra is one of them. Mohamed Ali and Mohaimen, each team leads, were aware of the situation and were trying to resolve it for me, but Ahmed Tamam denied.
- 8- Item 8: An email that I received on March 25th, 2020 from Rica Serapio one day after the termination saying that the investigation was conducted by a third party for the client, Google. In Accenture's position statement to the EEOC (Item 5) they mentioned that Google's Global investigation team concluded that they don't want me back. Furthermore, in APD's report, Google wasn't answering Detective Snider. This creates a lot of confusion about who really did the investigation, where Google and Accenture got their information from about the complaint and the threat, and finally how they came to the conclusion that I was the one who called the FBI and police.